

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In re:

ADELPHIA COMMUNICATIONS CORP., *et al.*, a Delaware corporation,

Debtors.

\_\_\_\_\_  
ADELPHIA RECOVERY TRUST,

Plaintiff,

v.

PRESTIGE COMMUNICATIONS OF NC,  
INC., *et al.*,

Defendants.

Chapter 11 Case

Case No. 02-41729 (REG)

(Jointly Administered)

07 Civ. 11152 (LMM)

(Related to 03 MDL 1529 (LMM)  
and 05 Civ. 9050 (LMM))

**NOTICE OF MOTION FOR *PRO HAC VICE* ADMISSION OF  
SEAN P. DAILEY OF TROUTMAN SANDERS LLP**

PLEASE TAKE NOTICE THAT, upon the annexed declaration of Sean P. Dailey, dated February 19, 2008, and the exhibits annexed thereto, Defendants Prestige Communications of NC, Inc., *et al.* respectfully move this Court for an order pursuant to Local Civil Rule 1.3(c) granting leave to Sean P. Dailey of Troutman Sanders LLP to proceed *pro hac vice* as its attorney of record in this action.

Dated: New York, New York  
February 20, 2008

TROUTMAN SANDERS LLP

By: \_\_\_\_\_

Paul H. Deutch

[CONTINUED ON NEXT PAGE]

The Chrysler Building  
405 Lexington Avenue  
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*Attorneys for Defendants Prestige  
Communications of NC, Inc., et al.*

To:

David M. Friedman  
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Facsimile: (212) 506-1800

*Attorneys for Plaintiff Adelpia Recovery Trust*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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**DECLARATION OF PAUL DEUTCH IN SUPPORT OF DEFENDANTS'  
MOTION FOR *PRO HAC VICE* ADMISSION OF ATTORNEY**

Paul Deutch, an attorney duly admitted to practice before the Courts of the State of New York, hereby declares the following under penalties of perjury:

1. I am associated with the firm of Troutman Sanders LLP, attorneys for Defendants Prestige Communications of NC, Inc., *et al.* (the "Defendants") in the above-captioned action. I am a member in good standing of the bar of the State of New York and of the bar of the United States District Court of the Southern District of New York. I make this affirmation in support of the application of Sean P. Dailey to appear *pro hac vice* before the Court.

2. Mr. Dailey is an associate with Troutman Sanders LLP's Atlanta, Georgia office which is located in the Bank of America Plaza, Suite 5200, at 600 Peachtree Street, N.E., Atlanta, Georgia, 30308.

3. The Declaration of Mr. Dailey is annexed hereto as Exhibit "A".

4. I respectfully submit a proposed order granting the admission of Sean P. Dailey, *pro hac vice*, which is attached hereto.

**WHEREFORE**, Defendants respectfully request this Court to grant this motion to allow Sean P. Dailey to appear *pro hac vice* before this Court until the conclusion of this case.

Dated: New York, New York  
February 20, 2008

  
\_\_\_\_\_  
Paul H. Deutch

## EXHIBIT A

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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### **DECLARATION OF SEAN P. DAILEY IN SUPPORT OF DEFENDANTS' MOTION FOR *PRO HAC VICE* ADMISSION**

Sean P. Dailey, being duly sworn deposes and says:

1. I am an attorney with the law firm of Troutman Sanders LLP in its Atlanta, Georgia office, which is located in the Bank of America Building, Suite 5200, at 600 Peachtree Street, N.E., Atlanta, Georgia 30308. I make this affidavit in support of the application for my admission *pro hac vice* for the purpose of appearing on behalf of Defendants Prestige Communications of NC, Inc., *et al.* (the "Defendants") in the above-captioned action.

2. I am a 2002 graduate of Vanderbilt University Law School.

3. I have been licensed to practice law in Illinois since November 7, 2002. I am currently a member in good standing of the bar of the State of Illinois. An original Certificate of Good Standing from the State Bar of Illinois is annexed hereto as Exhibit "1".

4. My Application for Certificate of Fitness to Practice Law in Georgia is currently pending before the Supreme Court of Georgia, Office of Bar Admissions. My Petition for Admission (to the Georgia Bar) on Motion Without Examination was granted in December 2007.

5. I have been admitted to practice in the United States Court of Appeals for the Seventh Circuit, the United States District Court for the Northern District of Illinois, and the United States District Court for the Eastern District of Wisconsin.

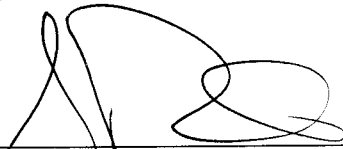
6. I never have been the subject of disciplinary action by the bar or courts of any jurisdiction in which I am licensed.

7. I never have been denied admission to the courts of any state or to any federal court.

8. Troutman Sanders LLP's New York offices are located in the Chrysler Building at 405 Lexington Avenue, New York, New York 10174, and its attorneys are qualified to practice before this Court.

9. I am familiar with the Federal Rules of Civil Procedure, the Federal Rules of Evidence and the Local Rules of this Court.

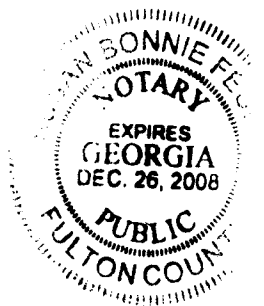
**WHEREFORE**, I respectfully request that this Court authorize my admission *pro hac vice* for the purpose of appearing in all matters and proceedings in this action.

  
\_\_\_\_\_  
SEAN P. DAILEY

Subscribed and sworn to before me

this 19<sup>th</sup> day of February 2008.

Susan Bonnie Feuer  
Notary Public



**EXHIBIT 1**

**CERTIFICATE OF GOOD STANDING**

**From**

**STATE BAR OF ILLINOIS**

**For**

**SEAN P. DAILEY**



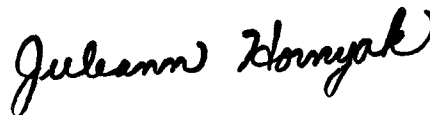
## **Certificate of Admission To the Bar of Illinois**

I, Juleann Hornyak, Clerk of the Supreme Court of Illinois, do hereby certify that

Sean Patrick Dailey

has been duly licensed and admitted to practice as an Attorney and Counselor of Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on November 7, 2002 and is in good standing, so far as the records of this office disclose.

In Witness Whereof, I have hereunto  
placed my hand and affixed the seal  
of said Supreme Court, at Springfield,  
in said State, this Friday, February 15, 2008.

A handwritten signature in black ink, reading "Juleann Hornyak". The signature is written in a cursive, flowing style.

Clerk

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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**ORDER FOR *PRO HAC VICE* ADMISSION ON WRITTEN MOTION**

Upon the motion of Defendants Prestige Communications of NC, Inc. *et al.*, and Sean P. Dailey's affidavit in support thereof, and Paul Deutch's sponsor affidavit in support;

**IT IS HEREBY ORDERED** that:

Applicant's Name: Sean P. Dailey  
Firm Name: Troutman Sanders LLP  
Address: 600 Peachtree Street  
City/State/Zip: Atlanta, Georgia 30308-2216  
Telephone/Fax: (404) 885-4562 / (404) 962-6528  
Email Address: sean.dailey@troutmansanders.com

is admitted to practice *pro hac vice* as counsel for Defendants Prestige Communications of NC, Inc., *et al.* in the above-captioned matter in the United States District Court for the Southern

District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the rules governing discipline of attorneys. If this action is assigned to the Electronic Case filing (ECF) system, counsel shall immediately apply for an ECF password at [www1.nysd.uscourts.gov](http://www1.nysd.uscourts.gov). Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated: \_\_\_\_\_, 2008

City, State: New York, New York

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United States District Judge

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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**CERTIFICATE OF SERVICE**

I hereby certify that, on this 21 day of February 2008, a true and correct copy of Defendants' Notice of Motion For *Pro Hac Vice* Admission of Sean P. Dailey with Declaration and Exhibits annexed thereto was sent by first-class United States mail, postage prepaid, to:

David M. Friedman  
Joseph A. Gershman  
KASOWITZ, BENSON, TORRES & FRIEDMAN LLP  
1633 Broadway  
New York, NY 10019

Paul H. Deutch

